

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CASEY
KIRSCHNER; ALLCORE DEVELOPMENT
LLC; FINBRIT HOLDINGS LLC;
CHESHIRE VENTURES LLC; CARLETON
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,

Intervening Interpleader
Plaintiff, Intervening
Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;
BW HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON
DATA SERVICES, INC.,

Interpleader Defendants,
Interpleader Counter-Plaintiffs.

PLAINTIFFS' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

In accordance with the Agreed Protective Order in this case (Dkt. 55), Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. respectfully seek leave to file under seal (i) Exhibit 1 to the Declaration of Amanda J. Sterling in Support of Plaintiffs' Reply in Support of Their Motion to Withdraw and Substitute Verifications and Certain Declarations and for Protective Order; and (ii) the unredacted version of Plaintiffs' Reply in Support of Their Motion to Withdraw and Substitute Verifications and Certain Declarations and for Protective Order ("Reply").

Exhibit 1 is a letter related to a settlement agreement among Brian Watson and third parties Kyle Ramstetter and Will Camenson, *see* Dkt. 151 ¶ ii, which Will Camenson produced in discovery in this case, designated as "Confidential" under the Protective Order, and Bates stamped WC22_000297 to WC22_000303. The redacted portion of Plaintiffs' Reply refers to material drawn entirely from Exhibit 1.

References to Exhibit 1 in Plaintiffs' (proposed) Third Amended Complaint, Dkt. 608-2 ¶ 238, are currently under seal pending the Court's ruling on the motion to seal that Plaintiffs filed concurrently therewith, Dkt. 610. As Plaintiffs noted in their memorandum in support of that motion, Plaintiffs have no objection to the confidentiality designation of Exhibit 1, Dkt. 611 at 3 n.1, and have filed the instant motion to comply with the Protective Order and Local Civil Rule 5(C), which provides that "[w]hen a party moves to file material under seal because another party has designated that material as confidential, the party designating the material as confidential must file a response to the motion . . . along with a proposed order."

Dated: April 4, 2022

Respectfully submitted,

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Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following parties via U.S. mail to their last-known address and by email, where noted:

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s/ Michael R. Dziuban

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